

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

INTELLECTUAL VENTURES I LLC and)	
INTELLECTUAL VENTURES II LLC,)	
)	
<i>Plaintiffs,</i>)	C.A. No. 4:24-cv-00980-ALM
)	
v.)	
)	JURY TRIAL DEMANDED
AMERICAN AIRLINES, INC.)	
)	
<i>Defendant.</i>)	

**DECLARATION OF JONATHAN K. WALDROP IN SUPPORT OF PLAINTIFFS’
OPPOSITION TO DEFENDANT’S MOTION TO SEVER AND STAY CLAIMS
AGAINST VIASAT’S IN-FLIGHT CONNECTIVITY SYSTEMS**

I, Jonathan K. Waldrop, declare as follows:

1. I am a Partner with the law firm of Kasowitz Benson Torres LLP. I am one of the attorneys responsible for the representation of Plaintiffs Intellectual Ventures I LLC and Intellectual Ventures II LLC (“Plaintiffs”) in this matter and make this declaration in support of Plaintiffs’ Opposition to Defendant’s Partial Motion to Sever and Stay Claims Against Viasat’s In-Flight Connectivity Systems.

2. If called to testify under oath in court, I could and would testify competently to the facts stated herein.

3. Attached hereto as Exhibit A is a true and correct copy of the Complaint for Declaratory Judgment, *Viasat, Inc. v. Intellectual Ventures I LLC and Intellectual Ventures II LLC*, Case No. 1:25-cv-00056-CFC (D. Del. Jan. 14, 2025).

I hereby declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge, information, and belief, formed after reasonable inquiry under the circumstances.

Executed on this 12th day of March, 2025, in Redwood Shores, California.

/s/ Jonathan K. Waldrop
Jonathan K. Waldrop